### Congress of the United States

Washington, DC 20510

March 29, 2022

Jeff Olivet, Executive Director United States Interagency Council on Homelessness 301 7<sup>th</sup> Street SW, Room 2080 Washington, DC 20407

Dear Mr. Olivet:

Members of the Los Angeles County Congressional Delegation urge the United States Interagency Council on Homelessness (USICH) to include several of the Los Angeles Homeless Services Authority's (LAHSA) recommendations in the next Federal Strategic Plan to Prevent and End Homelessness. The addition of these recommendations, created in conjunction with lived experience advocates, will produce a more informed plan that addresses homelessness in both Los Angeles County and across the Nation.

California, particularly Los Angeles County, is often branded as the epicenter of our Nation's homelessness crisis – due to the high cost and low availability of housing, and the lasting legacy of systemic racial discrimination. The most recent Greater Los Angeles Homeless Point-in-Time Count, captured before COVID-19, reported 66,436 people in Los Angeles County experience homelessness on a given night.¹ Furthermore, a 2020 UCLA Luskin School of Public Affairs study predicted that between 36,000 and 120,000 households in Los Angeles County could enter into homelessness due to a COVID-19 related eviction, potentially causing a large increase to current numbers.²

In response to this ongoing homelessness crisis, Los Angeles County made investments to improve its housing availability and services. In 2016, Los Angeles voters passed Proposition HHH, a \$1.2 billion bond to provide permanent supportive housing to the City of Los Angeles.<sup>3</sup> Los Angeles County residents also approved Measure H: a quarter-cent sales tax to raise an estimated \$3.5 billion over ten years for short-term housing and services.<sup>4</sup> Since the implementation of Measure H in 2017, Los Angeles' rehousing system has more than doubled its annual housing placements – rehousing 22,769 individuals in 2019 alone.<sup>5</sup> Subsequently, in the wake of the pandemic, California and Los Angeles County led the charge to debut innovative new programs such as Project Roomkey (which housed thousands of the most COVID-19 vulnerable people experiencing homelessness in vacant hotels and motels) and Project Homekey (which converts hotels, motels, and other properties into permanent housing).<sup>6</sup> Yet, these actions are still not enough to fully address the crisis.

Before and during the pandemic, LAHSA developed and implemented coordinated responses to address homelessness. On November 24<sup>th</sup>, 2021, LAHSA submitted input on USICH's next Federal Strategic Plan to Prevent and End Homelessness. Based upon LAHSA's letter, we find it vital for the next Federal Strategic Plan to: (1) include Housing First and Trauma-Informed Care; (2) mitigate the difficulties to obtain documentation for housing; (3) ensure livable wages and invest in capacity building for care and service workers; (4) the removal of justice-system barriers that prevent housing; and (5) encourage or require the inclusion of lived experience advocates in federal, state, and local programs. We express our strong support for a Federal Strategic Plan that incorporates these LAHSA recommendations

## 1. Include Housing First and Trauma-Informed Care in this and Future Federal Strategic Plans

USICH should include and emphasize the merits, data, and successes of Housing First and Trauma-Informed Care best practices in this and future Federal Strategic Plans. Housing First is an evidence-based approach grounded in the principles of individualized support, participant choice, and housing and services without preconditions. This model provides client flexibility by not requiring program participation to access resources. However, Housing First does not mean "housing only," instead the approach provides supportive services when and if the client is inclined to use them. Housing First has demonstrated effectiveness for people experiencing homelessness to obtain housing faster and remain housed longer. Programs modeled after Housing First reported increased client autonomy, 8 improved physical and behavioral health outcomes, and reduced use of crisis services. Trauma-Informed Care recognizes, understands, and responds to clients' traumas and equips providers with the necessary tools to best support clients. 10 The inclusion of Housing First as a best practice will help combat mischaracterizations and reduce the possibility of reversal in future administrations, as was attempted by the last Administration. USICH should also encourage the U.S. Department of Housing and Urban Development (HUD) to explore the feasibility of bolstering the use of Housing First in the Continuum of Care (CoC) Program regulations (CFR 578) and ensure CoCs have the tools needed to employ it. The explicit inclusion of both Housing First and Trauma-Informed Care will encourage greater use of best practices nationwide.

#### 2. Mitigate the difficulties to obtain documentation for housing

People experiencing homelessness struggle to obtain the personal documents necessary to access housing, a hurdle made even more difficult during the pandemic. The Los Angeles homeless services system found that about two-thirds (3,800) of the 5,835 COVID-19 currently enrolled Los Angeles County Project Roomkey participants in need of permanent supportive housing did not have access to their Social Security information. The inability to obtain Social Security information, or even the most basic forms of ID, causes system bottlenecks and slows entry into housing. To fix these difficulties, we recommend USICH collaborate with HUD and the Social Security Administration (SSA) to identify barriers to obtain documentation, the purposes behind these requirements, and ways to mitigate these challenges. USICH should also request that HUD expand Public Housing Authority (PHA) access to the Enterprise Income Verification (EIV) System and request that SSA approve Data Exchange Requests with Continuum of Care Programs. Increased Data Exchange Request approvals, greater EIV system access, and reduced barriers to documentation will allow providers to promptly verify necessary client details for housing and increase the rate of housing placements.

#### 3. Ensure livable wages and invest in capacity building for care and service workers

Public agencies are often spread thin with limited staff capacity to oversee the long-term programs necessary to address homelessness. Subsequently, homeless service providers and other direct service and care workers were overextended to scale up and meet the needs of COVID-19 response efforts. This led to increased burnout, turnover, and vacancies. Accordingly, clients experienced greater inconsistencies and interrupted services, which slows down housing placements. With the current influx of state and federal resources to

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address homelessness, agencies must be equipped to recruit and retain employees. USICH should encourage the federal government to pay reasonable administrative rates on programs to allow agencies to pay workers livable wages, explore benefits (such as loan forgiveness), and invest in capacity building for homeless service providers. Greater capacity and livable wages for staff will allow homeless service providers to retain desperately needed talent in the sector.

#### 4. The removal of justice-system barriers that prevent housing

USICH should propose solutions to mitigate the barriers that individuals experiencing homelessness face from the justice system. For individuals who do become incarcerated, whether they were at risk of homelessness or already experiencing it, exiting incarceration can be both a blessing and a curse. Limited reentry resources trap many in a cycle between the justice system and the homeless services system. Furthermore, existing housing resources have numerous restrictions for those with histories of justice system involvement, which disproportionately impact people of color experiencing homelessness. For example, Black residents are both excessively represented in the population experiencing justice involvement and the population experiencing homelessness. Black men are six times more likely to be incarcerated than White men, 11 and 60% of the individuals experiencing homelessness in Los Angeles County have had some type of justice system involvement in their lifetime. 12 In 2020, Black individuals made up eight percent of the general population in Los Angeles County, but nearly 34% of the homeless population. 13 USICH should develop resources targeted for the reentry population; such as removing restrictions in federal housing resources and establishing a housing voucher paired with supportive services for people exiting a carceral institution. The inclusion of programs designed for returning citizens would address a historical lack of services for a significant population of people experiencing homelessness.

# 5. Encourage or require the inclusion of lived experience advocates in federal, state, and local programs

Individuals with lived experiences of homelessness are uniquely valuable advocates to shape policy, develop programs, and advance change. The inclusion of lived experience advocates adds first-hand knowledge about system gaps and should be taken into consideration by federal agencies that touch the homeless services system such as USICH, HUD, and the U.S. Department of Health and Human Services (HHS). These agencies should also encourage the inclusion of lived experienced advocates as a part of local oversight and advocacy groups. Additionally, USICH should support the employment of peer support specialists with lived experience within the homeless services system. We also recommend compensating lived experience advocates and employees fairly for their time without jeopardizing their public benefits eligibility. To that end, USICH should commission a study informed by lived experience advocates on ways to abate reductions in benefits that explores specific savings accounts with deposited funds not labeled as income, making compensation for lived experience advocate work an income exclusion, and the mental health impacts of losing benefits due to compensation. The prioritization of lived experience advocates will ensure that policies at all levels of government are better informed.

As you prepare the next Federal Strategic Plan to Prevent and End Homelessness, we ask that USICH incorporate these five recommendations to create a plan that will more effectively address the homelessness crisis.

### Sincerely,

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- <sup>1</sup> LAHSA, "2020 Greater Los Angeles Homeless Count Results" (June 2020) https://www.lahsa.org/news?article=726-2020-greater-los-angeles-homeless-count-results
- <sup>2</sup> UCLA Luskin School of Public Affairs, "UD Day: Impending Evictions and Homelessness in Los Angeles" (May 2020) https://escholarship.org/uc/item/2gz6c8cv
- <sup>3</sup> Local Housing Solutions, "Los Angeles Proposition HHH" (August 2020) https://localhousingsolutions.org/housing-policy-case-studies/los-angeles-proposition-hhh/#:~:text=Los%20Angeles%20voters%20passed%20Proposition%20HHH%20in%202016%2C,can%20be%20used%20to%20help%20build%20temporary%20shelters.

  <sup>4</sup> *Ibid*.
- <sup>5</sup> LAHSA, "2020 Greater Los Angeles Homeless Count Results" (June 2020) https://www.lahsa.org/news?article=726-2020-greater-los-angeles-homeless-count-results
- <sup>6</sup> National Alliance to End Homelessness, "Homekey: California's Statewide Hotels-to-Housing Initiative" (July 2021) https://endhomelessness.org/wp-content/uploads/2021/07/CA-H2H-Case-Study 7-19-21.pdf
- <sup>7</sup> National Alliance to End Homelessness, "Housing First" (April 2016) https://endhomelessness.org/resource/housing-first/
- <sup>8</sup>*Ibid*.
- <sup>9</sup> United States Department of Housing and Urban Development, "Housing First in Permanent Supportive Housing Brief" (July 2014) https://www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/
  <sup>10</sup> The Open Health Services and Policy Journal, "Shelter from the Storm: Trauma-Informed Care in Homelessness Service Settings" (March 2010) https://benthamopen.com/ABSTRACT/TOHSPJ-3-80
- <sup>11</sup> The Sentencing Project, "Fact Sheet: Trends in US Corrections" (May 2021) https://www.sentencingproject.org/publications/trends-in-u-s-corrections/
- LAHSA, "Greater Los Angeles Homeless Count Results" (May 2018) https://www.lahsa.org/documents?id=2059-2018-greater-los-angeles-homeless-count-presentation.pdf
   Ibid.